

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

SHELDON LOCKETT, MICHELLE DAVIS; )  
AND CLYDE DAVIS, ) CASE NO.  
2:18-CV-5838-PJW  
PLAINTIFFS, )  
VS. )  
COUNTY OF LOS ANGELES, A PUBLIC )  
ENTITY; LOS ANGELES COUNTY )  
SHERIFF'S DEPARTMENT, A LAW )  
ENFORCEMENT AGENCY; SHERIFF )  
JIM MCDONNELL; MIZRAIN ORREGO, A )  
DEPUTY LOS ANGELES COUNTY SHERIFF; )  
SAMUEL ALDAMA, A DEPUTY )  
LOS ANGELES COUNTY SHERIFF; AND )  
DOES 1 THROUGH 100, INCLUSIVE, )  
DEFENDANTS. )  
\_\_\_\_\_ )

REMOTELY TAKEN DEPOSITION OF

CAPTAIN WILLIAM JAEGER

LOS ANGELES, CALIFORNIA

MAY 27, 2020

JOB NO. 4118329

REPORTED BY: VICTORIA I. WERTZ, RPR, CSR NO. 7999

PAGES 1-102

1	A Sir, I don't know why a formal	11:04:59
2	investigation was not requested. I can tell you	11:05:02
3	that Internal Affairs Bureau is given an	11:05:05
4	investigation after information is determined of	11:05:12
5	some sort of wrongdoing.	11:05:17

6	My knowledge is that Compton station has	11:05:21
7	not gotten to that or risen to that level, and	11:05:23
8	therefore, no formal investigation was conducted.	11:05:27

9	Q	So you don't feel there was any wrongdoing	11:05:29
10		within the Compton station; is that correct?	11:05:32

11	MR. ALTURA: Actually, misstates	11:05:38
12	testimony, overbroad.	11:05:39

13	BY MR. SWEENEY:	11:05:42
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14	Q I mean, wrongdoing with respect to the	11:05:42
15	alleged clique gang within Compton station.	11:05:46

16 MR. ALTURA: Same objections. 11:05:52

17	THE WITNESS: Again, sir, you are asking	11:05:55
18	the question in a way that is suggesting to me that	11:05:57
19	it's a known fact that we have a gang in Compton.	11:06:03

20 And I don't know that to be the case. 11:06:06

21 BY MR. SWEENEY: 11:06:09

22	Q Okay.	11:06:09
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23	Hypothetically, if there were a clique	11:06:10
24	gang with 20 members -- or maybe 40 members -- and	11:06:12
25	they were aggressively policing and committing	11:06:18

1 BY MR. SWEENEY: 11:10:00

2 Q Captain Jaeger, I'm not talking about you 11:10:00

3 doing an investigation. I'm asking why your 11:10:03

4 department didn't do an investigation into the 11:10:07

5 sheriff clique gang when you found out that there 11:10:10

6 were 20 tattooed deputies at the station. 11:10:13

7 MR. ALTURA: Objection, lacks foundation. 11:10:19

8 Assumes facts that have not been established. 11:10:24

9 THE WITNESS: Sir, I'm not able to answer 11:10:27

10 that question simply based on the fact that you are 11:10:28

11 asking why the department did not investigate that. 11:10:31

12 The leadership within the organization has 11:10:35

13 to request an investigation to be done. That 11:10:36

14 request never came to Internal Affairs. 11:10:41

15 BY MR. SWEENEY: 11:10:44

16 Q But why? 11:10:44

17 A I don't know, sir. 11:10:48

18 Q Why do you suspect? 11:10:52

19 MR. IVIE: Objection, Mr. Sweeney, that 11:10:55

20 calls for speculation. Objection on the 11:10:56

21 part -- it's beyond the scope of the designation. 11:10:59

22 BY MR. SWEENEY: 11:11:04

23 Q Would you agree with me that if an 11:11:04

24 organization of rogue deputies existed within the 11:11:11

25 Compton station that they should be investigated? 11:11:16

1 I'm not saying there is one. But wouldn't 11:11:19  
2 you agree with me that if a rogue group of deputies 11:11:21  
3 within the Sheriff's Department existed in the 11:11:26  
4 Compton station, they should be investigated? 11:11:28  
5 MR. ALTURA: I will object that it lacks 11:11:33  
6 foundation and beyond the scope. It calls for 11:11:35  
7 speculation. 11:11:37  
8 MR. IVIE: The question is also ambiguous 11:11:43  
9 and vague in terms of what you mean by "rogue." 11:11:45  
10 BY MR. SWEENEY: 11:11:50  
11 Q You can answer the question. 11:11:50  
12 A I will agree that any suggestion of 11:11:56  
13 misbehavior by a deputy or a group of deputies at a 11:12:00  
14 station should be investigated, yes. 11:12:03  
15 Q Do you know this group of at least 20 or 11:12:15  
16 up to 40 deputies -- at the Compton station -- do 11:12:17  
17 you know whether or not it is a secret society? 11:12:23  
18 MR. IVIE: Objection, that question 11:12:33  
19 assumes facts not established. And also calls for 11:12:34  
20 speculation on the part of the witness. 11:12:38  
21 BY MR. SWEENEY: 11:12:40  
22 Q You can answer. 11:12:40  
23 A Sir, I am not aware of -- first over 11:12:41  
24 anything termed a secret society. I'm not sure 11:12:46  
25 that I would have knowledge of if it was truly 11:12:49

1 secret. And secondly, I have not been or been made 11:12:53  
2 aware that there is such a group of individuals 11:12:58  
3 that are behaving against the policies and 11:13:01  
4 procedures of the department. 11:13:04

5 Q Do you believe that Samuel Aldama behaved 11:13:06  
6 improperly when he shot and killed Dante Taylor? 11:13:11

7 MR. IVIE: That is clearly outside of the 11:13:20  
8 scope of the designation. 11:13:22

9 MR. SWEENEY: Okay. 11:13:24

10 Is that your objection? 11:13:26

11 MR. IVIE: Yes. 11:13:28

12 BY MR. SWEENEY: 11:13:30

13 Q Okay. 11:13:30

14 You can answer. 11:13:31

15 A I believe that that shooting was 11:13:34

16 investigated. I believe that it went to an 11:13:37

17 Executive Force Review Committee, and I believe the 11:13:41

18 committee weighed in as to their findings of that. 11:13:43

19 I don't share any opinion. 11:13:46

20 Q Okay. 11:13:48

21 Have you seen the deposition of 11:13:50

22 Samuel Aldama in Andrew Taylor versus County of 11:13:53

23 Los Angeles? 11:14:07

24 A I have seen a portion of it. 11:14:09

25 Q And you saw the portion where I asked 11:14:12

1           A    Again, sir, I don't believe there was a           11:28:05  
2   request for an investigation to be done. I believe       11:28:08  
3   that Sheriff McDonnell, in the opening paragraph,       11:28:10  
4   said a "comprehensive inquiry." That's not an           11:28:13  
5   investigation.   11:28:18

6           Q    Do you agree that an inquiry should have       11:28:19  
7   been undertaken at the Compton station into this up     11:28:24  
8   to 20 -- maybe as many as 40 gang members with       11:28:31  
9   similar tattoos?   11:28:38

10          MR. IVIE: Objection, assumes facts not in       11:28:42  
11   evidence, facts established. Called for               11:28:44  
12   speculation on part of the witness.                   11:28:47

13          MR. ALTURA: I will join those objections       11:28:49  
14   and object that it's outside of the scope.             11:28:50

15   BY MR. SWEENEY:   11:28:53

16          Q    You can answer.                               11:28:53

17          MR. IVIE: Outside of the scope of the           11:28:55  
18   designation, Mr. Sweeney.                               11:28:56

19          You can answer.                                   11:28:58

20   BY MR. SWEENEY:   11:28:58

21          Q    You can answer.                               11:28:58

22          A    I'm not aware of any behavior that would     11:28:59  
23   lead to an investigation. As to an inquiry into       11:29:04  
24   any matter, I'm not here to lay judgment on whether   11:29:07  
25   or not it should have or should not have been done.   11:29:13

1 I don't know any facts to support that. 11:29:16

2 Q Do you think that a Deputy Sheriff with a 11:29:21

3 badge and gun doing things under color of authority 11:29:26

4 who admits that he has ill feelings towards 11:29:30

5 blacks -- do you think that that would 11:29:34

6 trigger -- should have triggered an investigation? 11:29:37

7 MR. IVIE: That's outside of the scope of 11:29:42

8 the designation. It assumes facts not established. 11:29:45

9 Argumentative. Incomplete hypothetical. Calls for 11:29:49

10 speculation and conjecture on the part of the 11:29:53

11 witness. 11:29:56

12 BY MR. SWEENEY: 11:29:56

13 Q You can answer. 11:29:56

14 A Sir, again, going back to the deputy's 11:30:00

15 testimony, I don't believe that his testimony ended 11:30:04

16 at the point of him having ill feelings towards a 11:30:07

17 particular group -- as I remember reading the 11:30:10

18 testimony. 11:30:13

19 That said, certainly I am not going to 11:30:15

20 disagree with you that if a deputy did have ill 11:30:18

21 feelings towards a particular group based on race, 11:30:22

22 and there was some misconduct that was going along 11:30:29

23 with that, that should absolutely be investigated. 11:30:33

24 Q Thank you. 11:30:36

25 Moving on to Category 3. 11:30:44

Page 54

REPORTER'S CERTIFICATE

I, VICTORIA IMHOF WERTZ, RPR, CSR NO. 7999,  
Certified Shorthand Reporter, certify:

That the foregoing proceedings were taken  
before me at the time and place therein set forth,  
at which time the witness was put under oath by me;

That the testimony of the witness and all  
objections made at the time of the examination  
were recorded stenographically by me and were  
thereafter transcribed;

That the foregoing is a true and correct  
transcript of my shorthand notes so taken.

I further certify that I am not a relative  
or employee of any attorney or of any of the  
parties, nor financially interested in the action.

I declare under penalty of perjury under  
the laws of California that the foregoing is true  
and correct.

Dated this 2nd day of June, 2020.

A handwritten signature in cursive script, appearing to read "Victoria Imhof Wertz", is written over a horizontal line.

VICTORIA IMHOF WERTZ, RPR, CSR No. 7999